

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta
Payments, Inc.

State of Montana, *ex rel.* Austin Knudsen,
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook
Holdings, LLC, Facebook Operations, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC, Sculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805

MDL No. 3047

Case No.: 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

**DECLARATION OF MEGAN O'NEILL
IN SUPPORT OF STATE ATTORNEYS
GENERAL'S SECOND
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
INFORMATION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 I, MEGAN O'NEILL, declare and state as follows:

2 1. I am a Deputy Attorney General in the Consumer Protection Section of the California
3 Department of Justice. I am a member of good standing of the State Bar of California. I make this
4 declaration based on my own personal knowledge. If called upon to testify, I could and would testify
5 completely to the truth of the matters stated herein.

6 2. I submit this declaration, as required by Civil Local Rule 7-11, in support of the State
7 Attorneys General's Second Administrative Motion for Leave to File Supplemental Information.

8 3. On July 29, 2024, Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc.,
9 and Meta Platforms Technologies, LLC ("Meta") sent a Notice of Intent to Serve Subpoenas and attached
10 copies of 26 subpoenas to the Notice.

11 4. On July 30, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies of
12 two subpoenas to the Notice.

13 5. On July 31, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies of
14 twelve subpoenas to the Notice.

15 6. On August 1, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies
16 of fourteen subpoenas to the Notice.

17 7. On August 9, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies
18 of three subpoenas to the Notice.

19 8. The subpoenas directed to state agencies differ from Meta's earlier Requests for Production
20 of Documents served on the State AGs which had purported to demand the State AGs to produce
21 documents in the possession of numerous state agencies, including these agencies. The subpoenas contain
22 new requests directed to the agencies, while also repeating a subset of the prior Requests for Production
23 of Documents.

24 9. Additionally, on August 6, 2024, Meta provided to counsel from the Massachusetts Office
25 of the Attorney General its Notice of Intent to Serve Subpoena *Duces Tecum* for Production on six
26

Massachusetts entities in *Commonwealth of Massachusetts v. Meta Platforms, Inc.*, Massachusetts Superior Court No. 2384CV02397-BLS1.

10. The State AGs seek leave to submit Meta’s Notices of Intent to Serve Subpoenas through their concurrently filed Second Administrative Motion for Leave to File Supplemental Information.

11. On August 19, 2024, counsel for Meta wrote that “Meta takes no position on” the State AGs’ Second Administrative Motion for Leave to File Supplemental Information.

12. The State AGs submit this declaration in lieu of a stipulation because Meta has indicated that it takes no position on the State AGs’ Administrative Motion for Leave to File Supplemental Information.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 19, 2024, in San Francisco, California.

/s/ Megan O’Neill

MEGAN O’NEILL

Deputy Attorney General